SOUTHERN DISTRICT OF NEW YORK	V	
UNITED STATES OF AMERICA	: : :	
V.	:	
PETER GHAVAMI,	:	1:10-cr-01217-KMW
(aka PETER GHAVAMILAHIDJI); GARY HEINZ; and	:	
MICHAEL WELTY,	:	
Defendants.	:	
	X	

CERTIFICATE OF SERVICE

I, Kalina M. Tulley, hereby certify that a true and correct copy of the Memorandum of Law in Support of Government's Motion *in Limine* to preclude the defense from introducing the contents of third-party notes and agent summaries of witness interviews as extrinsic evidence of prior inconsistent statements, was served on all parties of record by electronic mail, on the following counsel, this 1st day of August, 2012.

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/s/ Kalina M. Tulley

Kalina M. Tulley
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